

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
GVS Portfolio I B, LLC,)	
)	Case No. 21-10690 (CSS)
Debtor. ¹)	
)	
)	

**CERTIFICATION OF COUNSEL REGARDING CONFIDENTIALITY
AGREEMENT AND STIPULATED PROTECTIVE ORDER**

The undersigned counsel for RREF III Storage LLC (“RREF”) hereby certifies that:

1. RREF and the above-captioned debtor (the “Debtor”), by and through their counsel, have entered into the Confidentiality Agreement and Stipulated Protective Order (the “Protective Order”), a copy of which is attached hereto as **Exhibit A**, to govern the production, review and handling of the materials to be produced or otherwise disclosed in connection with discovery undertaken during this chapter 11 case and, particularly, in connection with *RREF III Storage LLC’s Motion for Entry of an Order Dismissing the Debtor’s Chapter 11 Case with Prejudice and Granting Relief from the Automatic Stay* [D.I. 8].

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¹ The Debtor in this chapter 11 case, together with the last four digits of the Debtor’s taxpayer identification number, is as follows: GVS Portfolio I B, LLC (7171). The Debtor’s mailing address is 814 Lavaca Street, Austin, TX 78701.

WHEREFORE, the parties respectfully request that the Court enter the Protective Order at the Court's earliest convenience.

Dated: May 19, 2021

SAUL EWING ARNSTEIN & LEHR LLP

/s/ Monique B. DiSabatino

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